

## **EXHIBIT 9**



**REDACTED**

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Nokia Corp., and Nokia Solutions and Networks Oy's ("Nokia Defendants") pursuant to the Court's order (Dkt. No. 27) TQ Delta will supplement these disclosures as required by the Discovery Order and FED. R. CIV. P. 26(e).

**A. The Correct Names of the Parties to the Lawsuit**

TQ Delta, LLC is the correct name of the Plaintiff in this action. TQ Delta believes that Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC; Nokia of America Corp., Nokia Corp., and Nokia Solutions and Networks Oy are the correct names of the Defendants in this action.

**B. The Name, Address, and Telephone Number of Any Potential Parties**

Based on the facts known to TQ Delta at this time, TQ Delta is not aware of any potential parties.

**C. The Legal Theories and, In General, the Factual Bases of the Disclosing Party's Claims or Defenses**

**1. Liability**

As set forth in Plaintiff's Original Complaint (Dkt. No. 1) ("Complaint"), this is a case claiming patent infringement arising under the laws of the United States, Title 35 of the United States Code. TQ Delta's infringement allegations are further detailed in its Disclosure of Asserted Claims and Infringement Contentions served on November 4, 2021, including any supplements and amendments thereto. At this time, TQ Delta expects to provide additional detail on liability through expert testimony in accordance with the schedule provided to Court's Docket Control Order.

**2. Damages**

Due to the infringement described above, TQ Delta is entitled to at least a reasonable

royalty, together with pre- and post-judgment interest and costs, as provided under 35 U.S.C. § 284, in addition to enhanced damages for willful infringement, including attorneys' fees. TQ Delta further discusses damages in § H.2 (below).

**D. The Name, Address, and Telephone Number of Persons Having Knowledge of Relevant Facts, a Brief Statement of Each Identified Person's Connection with the Case, and a Brief, Fair Summary of the Substance of the Information Known by Such Person**

TQ Delta identifies the following witnesses:

<b>Name</b>	<b>Contact Information</b>	<b>Connection with Case</b>	<b>Summary of Information Known</b>
<b>Marcos Tzannes</b>	Contact through The Davis Firm PC	Primary inventor of TQ Delta's DSL Patents	Marcos Tzannes has information relating to the technology at issue in this case; the subject matter and inventions disclosed in the patents-in-suit, the work that resulted therein, and the benefits associated therewith; submissions and participation in relevant standards bodies; and the standards at issue in this case.
<b>Bruce Bernstein</b>	Contact through The Davis Firm PC		May have information concerning the parties' pre-suit communications and Defendants' pre-suit knowledge of the patents-in-suit.
<b>Mark Roche</b>	Contact through The Davis Firm PC	Managing Director at TQ Delta LLC	May have information concerning ownership of the patents-in-suit, TQ Delta's licensing activities, TQ Delta's pre-suit efforts to license its patent portfolio to CommScope and Nokia, and Defendants' pre-suit

Name	Contact Information	Connection with Case	Summary of Information Known
			knowledge of the patents-in-suit.
<b>Abha Divine</b>	Contact through The Davis Firm PC	Managing Director at TQ Delta LLC	May have information concerning ownership of the patents-in-suit, TQ Delta's licensing activities, TQ Delta's pre-suit efforts to license its patent portfolio to CommScope and Nokia, and Defendants' pre-suit knowledge of the patents-in-suit.
<b>Charles "Chuck" Treadway</b>	Counsel for CommScope [REDACTED] [REDACTED]	President and CEO of CommScope	Knowledge of at least his and CommScope's decision-making, strategy, and plans to spin-off the Home Networks business unit as an independent business and the Accused Products that are sold, offered for sale, imported, marketed, and distributed through that business unit; [REDACTED] [REDACTED]; demand for CommScope's portfolio of communications and networking technologies; location, type, and quantity of documents and things related to the aforementioned issues.
<b>Joe Chow</b>	Counsel for CommScope  Suwanee, GA	Senior Vice President and Segment Lead, Home Networks - CommScope	Knowledge of at least strategies, operations, and management of the Home Networks business unit, the CPE Portfolio, and the Accused Products that are sold, offered for sale,

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			imported, marketed, and distributed through that business unit; future plans and strategies for the new anticipated spin-off of the Home Networks business unit; retail and service providers that use or buy the Accused Products; location, type, and quantity of documents and things related to the aforementioned issues.
<b>Charles Cheevers</b>	Counsel for CommScope  Suwanee, GA	Chief Technology Officer – Home Networks at CommScope	Knowledge of at least strategies, operations, and management of the Home Networks business unit, the CPE Portfolio, and the Accused Products that are sold, offered for sale, imported, marketed, and distributed through that business unit; retail and service providers that use or buy the Accused Products; CPE business unit, Accused Products, and defining architectures for CPE devices at ARRIS; location, type, and quantity of documents and things related to the aforementioned issues.
<b>German Iaryczower</b>	Counsel for CommScope  Suwanee, GA	SVP of Sales, Americas, Home Networks – CommScope	Knowledge of hardware and software sales and engineering and product development cycles relating to Home Networks business unit and Accused Products; strategies, operation plans, supply chain, relationships with suppliers and partners,

Name	Contact Information	Connection with Case	Summary of Information Known
			and business P&L related thereto; CPE business unit, Accused Products, and R&D development at ARRIS; CPE devices at ARRIS; location, type, and quantity of documents and things related to the aforementioned issues.
<b>Joseph Yu</b>	6029 Mount Bonnell C Austin, TX 78731	(Former) Principal Software Engineer - CommScope	Knowledge of firmware and software relating to CPE and Accused Products.
<b>Bryce K. Garrett</b>	4612 Gentle Glen Dr. Carrollton, TX 75010	(Former) Director of Sales - ARRIS	Knowledge of AT&T account including deployment and use of ARRIS Residential Gateways (RGs); the ARRIS CPE portfolio including DSL, VDSL, VDSL2, Bonded VDSL, and G.fast.
<b>Chitralekha Joshi</b>	Counsel for CommScope  Austin, TX	Principal Engineer – CommScope  (Former) QA Manager – ARRIS	Knowledge of software, operation, and function of Accused Products; CPE devices and Accused Products at ARRIS; CPE devices at ARRIS location, type, and quantity of documents and things related to the aforementioned issues.
<b>Courtney Rosenthal</b>	Counsel for CommScope  Austin, TX	Principal Software Engineer - CommScope	Knowledge of software, operation, and function of CPE and Accused Products; CPE devices and Accused Products at ARRIS; location, type, and quantity of documents and things related to the aforementioned issues.

Name	Contact Information	Connection with Case	Summary of Information Known
<b>Jim Shead</b>	Counsel for CommScope  Austin, TX	Lead Counsel – CommScope  (Former) Senior Counsel – ARRIS  (Former) Associate General – Pace Americas	Knowledge of CommScope Defendants’ pre-suit knowledge and willful infringement of the Asserted Patents; CommScope’s patent and IP licensing practices and activities; location, type, and quantity of documents and things related to the aforementioned issues.
<b>Keith Mendel</b>	Counsel for CommScope  Alpharetta GA	Senior Director, Software Engineering – CommScope	Knowledge of software, operation, and function of CPE and Accused Products; CPE devices and Accused Products at ARRIS; location, type, and quantity of documents and things related to the aforementioned issues.
<b>Steve Wauters</b>	Counsel for CommScope  San Antonio, TX	Senior Vice President of Service Providers, North American Sales – CommScope	Knowledge of sales of CommScope products relating to service providers such as AT&T.
<b>Celite Milbrandt</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent Nos. 6,631,120; 6,636,603; 6,633,545.
<b>John McHale</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,366,644.
<b>John G. Bartkowiak</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,694,466.



Name	Contact Information	Connection with Case	Summary of Information Known
<b>Roger Bjork</b>	Round Rock, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,128,619.
<b>James Carlo</b>	Dallas, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,829,307.
<b>Kim Chang</b>	Richardson, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,233,247.
<b>Yaqi Cheng</b>	Rowlett, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,549,512.
<b>Harry L. Cochrane</b>	Liberty Hill, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,128,619.
<b>Terry L. Cole</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,424,674.
<b>Douglas E. Duschatko</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,983,414.
<b>George Hoekstra</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,751,741.
<b>Alfredo Linz</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,424,674.

Name	Contact Information	Connection with Case	Summary of Information Known
<b>Xiaolin Lu</b>	Dallas, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,910,970.
<b>William D. McCoy</b>	Wylie, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,392,299.
<b>Vijayakumaran V. Nair</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,424,674.
<b>Matthew A. Pendleton</b>	Cedar Park, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent Nos. 5,521,906 and 5,533,088.
<b>Tom R. Pohrte</b>	The Colony, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,608,643.
<b>Don S. Rhines</b>	Richardson, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,392,299.
<b>Jack A. Ross</b>	The Colony, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,608,643.
<b>Mathew A. Rybicki</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent Nos. 5,521,906 and 5,533,088.
<b>Ray G. Sadler</b>	Plano, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,608,643.

Name	Contact Information	Connection with Case	Summary of Information Known
<b>James R. Sisk</b>	Cedar Park, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,366,644.
<b>Andrew J. Thurston</b>	Liberty Hill, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,983,414.
<b>Raymond Paul Voith</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,751,741.
<b>Martin Wichter</b>	Arlington, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,608,643.
<b>Timothy L. Wilson</b>	Austin, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,128,619.
<b>Zheng-yi Xie</b>	Richardson, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 5,694,466.
<b>Song Wu</b>	Plano, TX	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent Nos. 6,219,378; 6,549,512; 6,649,512.
<b>Donald Shaver</b>	7938 Fallmeadow Ln Dallas, TX 75248	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,649,512.
<b>John M. Cioffi</b>	Redwood City, CA	Prior Artist  CEO – ASSIA Inc.	Knowledge of prior art asserted by CommScope - U.S. Patent No. 7,657,818 and 7,428,669.

<b>Name</b>	<b>Contact Information</b>	<b>Connection with Case</b>	<b>Summary of Information Known</b>
<b>James E. Petranovich</b>	San Diego, CA	Prior Artist  VP & CTO Technical Development – Viasat Inc.	Knowledge of prior art asserted by CommScope - U.S. Patent No. 8,644,341.
<b>William L. Betts</b>	2016 Montana Ave NE St. Petersburg, FL 33703	Prior Artist  Principal, Century Patent Consulting, Inc.	Knowledge of prior art asserted by CommScope – U.S. Patent No. 7,099,401.
<b>Chiihsin Kao</b>	282 College Ave. Mountain View, CA 94040	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,087,917.
<b>Jacky S. Chow</b>	San Francisco, CA	Prior Artist	Knowledge of prior art asserted by CommScope – U.S. Patent No. 6,064,692.
<b>Texas Instruments, Inc., including current/former employees thereof.</b>	12500 T I Blvd, Dallas, TX 75243	Prior Artist	Knowledge of multiple prior art asserted by CommScope – TNETD8000 User Guide; “Providing the Right Solution for VDSL” white paper; TNETD8000 chipset; TNETD8000 EVM; Virtuoso chipset; SDMT Products; and U.S. Patent Nos. 5,910,970; 6,219,378, 6,434,119, 6,549,512; 6,829,307, and 7,197,067.
<b>Krista Jacobsen</b>	Jacobsen IP Law 1999 S. Bascom Ave #700 Campbell, CA 95008	Prior Artist	Knowledge of prior art asserted by CommScope – “Providing the Right Solution for VDSL” white paper.

Name	Contact Information	Connection with Case	Summary of Information Known
<b>Igor Djokovic</b>	Irvine, CA	Prior Artist	Knowledge of prior art asserted by CommScope – PAR Reduction Without Noise Enhancement.
<b>AT&amp;T, Inc., including current/former employees thereof.</b>	208 S. Akard St. Dallas, TX 75202	Broadband Service Provider relating to CommScope Accused Products	Knowledge of the use, deployment, sale, offer for sale, distribution, sales, marketing, DSL standards compatibility, and operation of Accused Products by AT&T and the CommScope Defendants, including ARRIS, within the Eastern District of Texas, Texas, and elsewhere; CommScope's inducement of infringement; infringement and damages issues related thereto.
<b>All persons identified in any of Defendants' Initial Disclosures, including as amended or supplemented.</b>			

Pursuant to the Discovery Order and FED. R. CIV. P. 26, TQ Delta may modify or supplement this list of knowledgeable individuals based on its investigation and further discovery.

**E. Any Indemnity and Insuring Agreements Under Which Any Person or Entity May Be Liable to Satisfy Part or All of a Judgment Entered in This Action or to Indemnify or Reimburse for Payments Made to Satisfy the Judgment**

TQ Delta is not aware of any relevant indemnity or insurance agreements. The

CommScope Defendants and Nokia Defendants have alleged that there may be certain indemnity agreements that are relevant to this matter; however, TQ Delta has neither received nor reviewed the alleged agreements and thus is unable to confirm their existence or terms.

**F. Any Settlement Agreements Relevant to the Subject Matter of This Action**

TQ Delta is not aware of any relevant settlement agreements.

**G. Any Statement of Any Party to the Litigation**

TQ Delta is not aware of any relevant statements of any party to the litigation.

**H. Additional Disclosures Pursuant to Paragraph 3 of the Discovery Order**

**1. Production of Documents**

TQ Delta will begin producing or permitting the inspection of documents, electronically stored information, and tangible things in its possession, custody, or control that are relevant to the pleaded claims or defenses involved in this action and will continue to do so by the time limits set forth in the Patent Rules for the Eastern District of Texas and by the Discovery Order and Docket Control Order governing this action.

**2. Computation of Damages**

TQ Delta currently intends to rely on a damages expert to compute damages. Accordingly, TQ Delta respectfully defers the computation of damages until the time for expert disclosures provided by the Court's schedule. TQ Delta will produce or otherwise make available for inspection and copying the documents and other evidentiary material (not privileged or protected from disclosure) in its possession, custody, or control on which its computation of damages is based. TQ Delta reserves its right to challenge any damages calculation that Defendants offer and to offer an opposing calculation.

Dated February 22, 2022

Respectfully submitted,

By: /s/ William E. Davis, III

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***Counsel for TQ Delta, LLC***

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document and all attachments thereto is being served on this February 22, 2022, via e-mail on all counsel of record, each of whom is deemed to have consented to electronic service per Local Rule CV-5(a)(3).

/s/William E. Davis, III  
William E. Davis, III